

## **EXHIBIT D**

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

MEI YING LIU and SHU FANG CHEN,

Plaintiffs,

v.

Civil Action No. 03-2406 (KSH)  
Honorable Katherine S. Hayden, U.S.D.J.

ORIENTAL BUFFET, INC., d/b/a KING  
CHEF BUFFET; METROPOLITAN BUFFET  
CORPORATION, d/b/a METROPOLITAN  
BUFFET; AN NA ZHENG; XIAO YANG  
ZHENG; BEN LIANG ZHU; FRANK CHAN,  
a/k/a KAI TUNG CHEN, a/k/a KAI TONG  
CHEN, a/k/a KAI CHIANG CHAN, a/k/a KAI  
CHEUNG CHAN, a/k/a KAI CHEONG  
CHAN; and DE GI CHING, a/k/a TEH QI  
CHING, a/k/a JIMMY CHING,  
Defendants.

**PLAINTIFF SHU FANG CHEN'S RESPONSES AND OBJECTIONS TO  
DEFENDANTS' INTERROGATORIES**

TO: Steven C. Mannion, Esq  
DeCotiis, Fitzpatrick, Cole & Wisler, LLP  
Glenpointe Centre West  
500 Frank W. Burr Boulevard  
Teaneck, New Jersey 07666

As and for her Responses and Objections to Defendants' Interrogatories Shu Fang Chen  
("Chen") states as follows:

**General Responses and Objections**

1. These General Responses and Objections form a part of the response to each  
discovery request responded to herein by Chen. Thus, the absence of a reference to a General  
Response or Objection in response to a specific discovery request should not be construed as a  
waiver of the General Responses and Objections.

2. State the name, job title, address and telephone number of each and every person having knowledge of relevant facts relating to the subject matter of this incident, and identify the specific knowledge possessed by each person.

**RESPONSE:** *Shu Fang Chen possesses information concerning the working conditions and policies of Oriental Buffet Inc. Additionally, every employee of Oriental Buffet Inc. at the time Chen was an employee thereof has knowledge concerning the working conditions, policies and payroll practices of Oriental Buffet, Inc. Further, each individual defendant has knowledge of the working conditions, policies and payroll practices of Oriental Buffet, Inc. Chen is still in the process of locating contact information for the individuals identified herein. Chen reserves the right to supplement this response should additional information come to light during the course of discovery.*

3. Provide the names and addresses of all your employers for jobs held by you during the past ten years.

**RESPONSE:** *Chen objects to this Interrogatory because it is overly broad, unduly burdensome, oppressive and designed solely to harass. Chen further objects because the information sought by the Interrogatory is not relevant to any claim or defense in this action, nor is the request calculated to lead to the discovery of admissible evidence.*

4. Identify all individuals who you may produce or call to testify at the trial in this action.

**RESPONSE:** *Chen objects to this Interrogatory because it is premature. Chen intends to testify at trial in this matter as does Plaintiff Mei Ying Liu. Chen reserves the right to supplement her response to this Interrogatory during the course of discovery.*

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MEI YING LIU and SHU FANG CHEN,

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ORIENTAL BUFFET, INC., d/b/a KING  
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a/k/a KAI TUNG CHEN, a/k/a KAI TONG  
CHEN, a/k/a KAI CHIANG CHAN, a/k/a KAI  
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CHAN; and DE GI CHING, a/k/a TEH QI  
CHING, a/k/a JIMMY CHING,  
Defendants.

Civil Action No. 03-2406 (KSH)  
Honorable Katherine S. Hayden, U.S.D.J.

**PLAINTIFF MEI YING LIU'S RESPONSES AND OBJECTIONS TO  
DEFENDANTS' INTERROGATORIES**

TO: Donna duBeth Gardiner  
McElroy, Deutsche, Mulvaney, & Carpenter, LLP  
1300 Mount Kemble Avenue  
P.O. Box 2075  
Morristown, NJ, 07962

As and for her Responses and Objections to Defendants' Interrogatories to Plaintiff Mei Ying Liu ("Liu"), Liu states as follows:

**General Responses and Objections**

1. These General Responses and Objections form a part of the response to each discovery request responded to herein by Liu. Thus, the absence of a reference to a General Response or Objection in response to a specific discovery request should not be construed as a waiver of the General Responses and Objections.

esteem, injury or condition allegedly caused by defendants' conduct, set forth the name and address of each and every person visited or consulted by you for the diagnosis, and/or treatment of any such physical, mental and/or emotional illness, distress, trauma, pain, suffering, humiliation, loss of self respect and esteem, injury or condition.

***RESPONSE:** To date, Liu has not been diagnosed or treated for any physical or emotional harm suffered due to the Defendants' conduct. Liu reserves the right to supplement her response to this Interrogatory should she receive any treatment or a diagnosis resulting from the Defendants' conduct.*

14. Identify all positions held by you as an employee or as an independent contractor between January 2001, and the present and for each position, state:

- (a) The name of the person or company for who you performed services.;
- (b) Income earned; and
- (c) The length of time you worked for that person or entity.

***RESPONSE:** Liu objects to this Interrogatory because it is overly broad, unduly burdensome, oppressive and designed solely to harass. Liu further objects because the information sought by the Interrogatory is not relevant to any claim or defense in this action, nor is the request calculated to lead to the discovery of admissible evidence.*

As to General Responses and Objections and Specific Objections:

By:

  
George E. Patterson, Jr.

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Dated: January 6, 2006